

HONORABLE JOHN H. CHUN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KURT A. BENSHOOF, A.R.W. by and
through his father, KURT A. BENSHOOF,
BRETT FOUNTAIN, URVE MAGGITT,
Plaintiffs,

v.

ANDREA CHIN, ANTHONY BELGARD,
DONOVAN BROUSSARD, NATHAN
CLIBER, CATHERINE CORNWALL,
GREGG CURTIS, JANE DOE, JENNY
DURKAN, JOHN DUUS, NICHOLAS
EVANS, PASCAL HERZER, RYAN ELLIS,
MICHAEL FOX, TYLER GOSLIN, JULIE
KLINE, ERNEST JENSEN, JONATHAN
KIEHN, SPENCER KURZ, MAGALIE
LERMAN, RICHARD LIMA, ADAM
LOSLEBEN, YVES LUC, SARAH
MACDONALD, JACOB MASTERSON,
GRANT MAYER, STEVEN MITCHELL,
JOHNATHAN MUSSEAU, BREHON NESS,
LILIYA NESTERUK, STEPHEN
OKRUHLICA, KATRINA OUTLAND,
JESSICA OWEN, SARAH PENDLETON,
DWAYNE PIRAK, BRIAN REES, BLAIR
RUSS, JULIE SALLE, DANIEL
SCHILLING, TY SELFRIDGE, NATHAN
SHOPAY, STEVEN STONE, MICHAEL
TRACY, MELANIE TRATNIK, SARAH
TURNER, TREVOR TYLER, MICHAEL
VIRGILIO, ANDREW WEST, CHAD
ZENTNER, in their individual capacities,
CITY OF SEATTLE, KING COUNTY,
Defendants.

NO. 2:24-cv-00808-JHC

**DECLARATION OF TODD A. BOWERS
IN SUPPORT OF DEFENDANTS
JOINDER TO CITY OF SEATTLE'S
REPLY TO ORDER TO SHOW CAUSE
AND OBJECTION TO PROOFS OF
SERVICE**

DECLARATION OF TODD A. BOWERS IN
SUPPORT OF DEFENDANTS JOINDER TO
CITY OF SEATTLE'S REPLY TO PLAINTIFF'S
RESPONSE TO ORDER TO SHOW CAUSE
AND OBJECTION TO PROOFS OF SERVICE -

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1 I, Todd Bowers, declare under penalty of perjury pursuant to the laws of the United
2 States and the State of Washington, as follows:

3 1. I am over the age of 18 and am competent to testify to the facts stated in this
4 declaration. I have personal knowledge of the facts set forth in this declaration, and could testify
5 competently to them if called upon to do so.

6 2. I am the attorney of record for Defendant Sarah Turner and Defendant Michael
7 Tracy.

8 3. This Declaration provides factual information in support of Defendants Turner
9 and Tracy's joinder to Defendant City of Seattle's Reply to Plaintiff's Response to Order to
10 Show Cause and Objection to Proofs of Service, dated May 23, 2025 and filed as Docket No.
11 126 in this matter.

12 4. Attached as **Exhibit A** is a true and correct copy of a document entitled
13 "Summons in a Civil Action". Said document was received by Defendant Sarah Turner on or
14 around May 12, 2025. Said "Summons" does not include a date or signature of the Clerk of the
15 Court.

16 I declare under penalty of perjury under the laws of the United States of America and the
17 State of Washington that the foregoing is true and correct.

18 Signed on this 23rd day of May, 2025, at Seattle, King County, Washington.

19
20 s/ Todd A. Bowers

21 Todd A. Bowers, WSBA No. 24638
22
23
24
25

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CERTIFICATE OF SERVICE

The undersigned certifies under penalty of perjury under the laws of the United States and the State of Washington that on May 23, 2025, the foregoing document was served upon the following parties in the manner indicated below:

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Attorneys for Defendant City of Seattle

Dated: May 23, 2025

s/ Marry Marze
Marry Marze, Legal Assistant

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